

United States District Court  
Southern District of Texas  
FILED

MAY 09 2018

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

JUAN ANTONIO PEREZ  
JOSE ERNESTO SANCHEZ-VARELA  
MANUEL ESPINOZA, JR.§  
§  
§  
§  
§  
§  
§

Criminal No.

M-18-805

INDICTMENT

## THE GRAND JURY CHARGES:

Count One

On or about April 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN ANTONIO PEREZ  
JOSE ERNESTO SANCHEZ-VARELA  
and  
MANUEL ESPINOZA, JR.

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence located near Edinburg, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

Count Two

On or about April 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN ANTONIO PEREZ  
and  
MANUEL ESPINOZA, JR.**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from a location near Edinburg, Texas, to another location near Edinburg, Texas, by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

**Count Three**

On or about April 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN ANTONIO PEREZ  
JOSE ERNESTO SANCHEZ-VARELA  
and  
MANUEL ESPINOZA, JR.**

knowing and in reckless disregard of the fact that Pablo Flores-Ibarra was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Edinburg, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Four**

On or about April 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN ANTONIO PEREZ  
JOSE ERNESTO SANCHEZ-VARELA  
and  
MANUEL ESPINOZA, JR.**

knowing and in reckless disregard of the fact that Lesli Lizeth Padilla-Fernandez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Edinburg, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

A TRUE BILL

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FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY